

# **Privacy Policy**

## **Infinito Comics Private Limited**

Effective Date: **15<sup>th</sup> August, 2025.**

At Infinito Comics Private Limited ("**Infinito Comics**", "**we**", "**us**", or "**our**"), we value your trust and are committed to protecting the privacy of every individual who accesses or uses our website [Infinito Comics](#) and associated services. We understand the responsibility that comes with handling personal information, especially for our young readers and their families. This Privacy Policy outlines how we collect, use, store, process, and protect your personal data, in strict accordance with applicable Indian laws, including the Digital Personal Data Protection Act, 2023, the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

### **1. Purpose and Scope**

This Privacy Policy governs all personal information collected through our website, including during account registration, content access, feedback, and parental control functions. It applies to all users — adults, children, and legal guardians — and aims to ensure transparency, user rights, and data security, while also providing an age-appropriate and safe experience for children.

### **2. Legal Basis for Data Collection**

Our data collection practices are strictly governed by the Digital Personal Data Protection Act, 2023, which mandates lawful, transparent, and limited use of personal data. In the case of children, we comply with the Protection of Children from Sexual Offences (POCSO) Act, 2012, and the Juvenile Justice (Care and Protection of Children) Act, 2015, ensuring that no child's personal information is collected or processed without verified parental consent.

### **3. Information We Collect**

We collect personal information in a lawful and fair manner, either directly from users or their guardians, or automatically through their interactions with our platform. This includes:

- Personal Identification Data such as name, email address, phone number, age, gender, and parental contact information (for children under 18).
- Usage and Device Data such as IP address, browser type, operating system, access times, pages visited, and device identifiers.

- Interaction Data such as comments, feedback, community forum posts, and support queries.
- Parental Control Data including content preferences, usage settings, and monitoring activities submitted by parents or guardians.
- Cookies and Tracking Technologies to manage sessions, enable preferences, restrict inappropriate content for minors, and enhance user experience (see Cookie Policy for details).

#### **4. Use of Your Data**

All personal information collected is used for clearly defined and legitimate purposes. These include:

- To create and manage user profiles, including restricted-access accounts for minors.
- To provide age-appropriate comics and media experiences, aligned with content classification policies.
- To enable communication through newsletters, account alerts, and important updates (with opt-out options).
- To enforce parental control settings and comply with parental monitoring requirements.
- To ensure the safety of children and vulnerable users, and report any harmful or abusive behavior to appropriate authorities in compliance with the POCSO Act and IT Act.
- To detect, prevent, and investigate violations of our Terms of Use, including content abuse, harassment, or other misconduct.
- To analyze user preferences and improve website functionality and security.

We do not use children's data for behavioral advertising or profiling. All processing activities are subject to your (or your guardian's) explicit and revocable consent.

#### **5. Parental Consent and Child Data Protection**

In accordance with Indian law, users below the age of 18 are considered minors. As such, access to certain features or services requires verified parental or guardian consent. We offer tools that allow parents to:

- Approve or decline registration of their child;
- Monitor their child's account activity;
- Set content restrictions and access time limits;
- Request correction or deletion of their child's personal data.

We take all necessary steps to protect children's data, including applying high standards of encryption and avoiding any form of unnecessary or invasive data collection.

#### **6. Data Sharing and Disclosure**

We respect your privacy and never sell, rent, or trade personal information. We may only share your data:

- With verified parental consent (for users under 18);
- With third-party service providers (such as hosting, analytics, or customer support), under strict confidentiality and data protection agreements;
- When required by law, including compliance with court orders, law enforcement inquiries, or government directives under the IT Act, 2000;
- In connection with mergers, acquisitions, or legal restructuring, provided such transfers maintain your data protection rights.

All shared data is subject to robust security protocols and limited access policies.

## **7. Cookies and Tracking Technologies**

Infinito Comics uses cookies and related technologies to enhance your experience and deliver age-appropriate content. Cookies help us:

- Maintain session login and preferences;
- Provide customized navigation for children and adults;
- Prevent exposure to inappropriate content;
- Collect anonymous statistics for internal analytics.

In accordance with Rule 5 of the Sensitive Personal Data or Information (SPDI) Rules under the IT Act, users are informed about the use of cookies, and can choose to accept or decline them using browser settings or our cookie management panel. Children's cookies are minimal, non-invasive, and never used for advertising.

## **8. Data Storage, Retention, and Security**

All personal data is stored on secure servers located within India or countries that ensure equivalent data protection standards as approved by Indian authorities. We implement industry-standard measures such as SSL encryption, firewalls, role-based access control, and periodic security audits to prevent unauthorized access or breaches.

We retain personal data only for as long as necessary to fulfill the purposes stated herein or to meet legal and regulatory obligations. Inactive child accounts are reviewed periodically and may be deleted upon parental request.

## **9. User Rights Under Indian Law**

As a data principal under the Digital Personal Data Protection Act, 2023, you have the right to:

- Access the personal data held by us;
- Correct any inaccuracies in your data;

- Withdraw consent for any ongoing processing;
- Request deletion of your data;
- Be informed of data breaches affecting your information;
- File grievances with the Data Protection Board or our Grievance Officer.

These rights may be exercised by sending a written request to the Grievance Officer listed below.

## **10. Grievance Redressal and Contact**

In compliance with Rule 3(2) of the IT (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, and the DPDP Act, 2023, Infinito Comics has appointed a Grievance Officer to address all privacy-related concerns.

We are committed to resolving all complaints within 15 business days of receipt.

## **11. Updates to This Policy**

This Privacy Policy may be updated periodically to reflect changes in technology, law, or business practices. All material changes will be notified on our website and, where appropriate, by email. We encourage users to review this policy regularly.

## **12. Final Assurance**

Infinito Comics is dedicated to creating a creative and respectful space that prioritizes safety, dignity, and transparency. By using our services, you entrust us with your information, and we commit to handling it with care, in full compliance with Indian legal standards.